

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NOEL KAPETANAKOS,)
)
)
Plaintiff,) No. 11 CV 8805
)
)
vs.) Judge Elaine E. Bucklo
) Magistrate Judge Geraldine Soat Brown
)
JOSEPH SPALLONE, Star 433, and)
CAROL DOUGHERTY, Star 747,)
)
Defendants.)

MOTION TO WITHDRAW

Lawrence V. Jackowiak and Adele D. Nicholas of Jackowiak Law Offices respectfully move this Honorable Court for leave to withdraw as counsel for Plaintiff in this case.

1. On or about December 10, 2011, Plaintiff met with attorney Lawrence V. Jackowiak from Jackowiak Law Offices and retained Jackowiak Law Offices for her case.
2. The original complaint in this case was filed on December 12, 2011.
3. On April 2, 2012, the parties went before this Court for a Rule 16 scheduling conference.
4. Over the past few weeks, attorneys Lawrence V. Jackowiak and Adele D. Nicholas have had multiple conversations with Plaintiff via phone, and also in person on April 19, to discuss case strategy.
5. During these meetings, attorney Jackowiak and attorney Nicholas expressed opinions about case strategy and how to proceed next in the case.
6. Plaintiff strongly and repeatedly disagreed with attorney Jackowiak and attorney Nicholas on central strategy issues and about how to proceed next in the case.
7. As a result, there was a complete breakdown of the attorney client relationship. Moreover, an irreconcilable conflict arose which makes further effective representation impossible.

8. The content of the meetings are subject to the attorney-client privilege and therefore specifics cannot be discussed.

9. During the April 19 meeting, Plaintiff stated that she would begin looking for a new attorney and attorney Jackowiak indicated to Plaintiff that he would make all efforts to assist in the copy and transfer of her file to another attorney.

WHEREFORE, attorneys Lawrence V. Jackowiak and Adele D. Nicholas from Jackowiak Law Offices respectfully request that his Honorable Court grant them leave to withdraw from this case *instanter*.

Respectfully submitted,

/s/ Lawrence V. Jackowiak

/s/ Adele D. Nicholas

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